

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA

v.

MARTIN ELLING

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Case No. 1:24-CR-45

MOTION FOR ADMISSION *PRO HAC VICE* OF MARJORIE J. PEERCE

Thomas J. Bondurant (“Movant”), a member of good standing of the bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States District Court for the Western District of Virginia, and counsel of record in this case, hereby moves the Court for entry of an order authorizing Marjorie J. Peerce to appear *pro hac vice* before this Court on behalf of the Defendant Martin Elling, pursuant to Local Rule 6(d), and in support hereof, states as follows:

1. Marjorie J. Peerce is qualified and licensed to practice law in the State of New York and the District of Columbia. She was admitted to the New York Bar (no. 1921683) on April 16, 1984 and was admitted to the District of Columbia Bar on August 23, 1985. She is in good standing with both bars.
2. Ms. Peerce practices with the law firm Ballard Spahr and maintains a business address at 1675 Broadway, 19th Floor, New York, NY 10019-5820.
3. Ms. Peerce has not previously sought admission *pro hac vice* in the United States District Court for the Western District of Virginia.
4. Ms. Peerce’s contact information is as follows:

Marjorie J. Peerce
BALLARD SPAHR

1675 Broadway, 19th Floor
New York, NY 10019-5820
Direct Dial: 646.346.8039
Email: peercecm@ballardspahr.com

5. Movant requests that this Court admit Marjorie J. Peerce to appear *pro hac vice* before this Court for the purpose of appearing as counsel in this case and related proceedings on behalf of the Defendant.
6. Movant and his law firm shall serve as co-counsel to the Defendant in this case and related proceedings.
7. Movant requests that Marjorie J. Peerce be permitted to appear at hearings or trials in the absence of Movant, as permitted under Local Rule 6(d) at the Court's discretion.

WHEREFORE, Movant respectfully requests that this Court enter an Order substantially in the form annexed hereto authorizing Marjorie J. Peerce to appear *pro hac vice* in this case and related hearings.

MARTIN ELLING

By: /s/ Thomas J. Bondurant, Jr.
Thomas J. Bondurant, Jr. (VSB No. 18894)
GENTRY LOCKE
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(540) 983-9300; Fax: (540) 983-9400
bondurant@gentrylocke.com

Counsel for Defendant

DATED: December 13, 2024

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2024, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which provides an electronic copy to all counsel of record.

/s/Thomas J. Bondurant, Jr.
Thomas J. Bondurant, Jr., Esq.